

George Haines, Esq.  
Nevada Bar No. 9411  
**FREEDOM LAW FIRM**  
8985 S. Eastern Ave., Suite 350  
Las Vegas, NV 89123  
Telephone: (702) 880-5554  
Facsimile: (702) 385-551  
ghaines@freedomlegalteam.com  
*Attorneys for Plaintiff Michaela Christian*

Brian D. Flick, Esq.  
Ohio Bar No. 81605 (admitted pro hac)  
**DANN LAW FIRM**  
2728 Euclid Avenue, STE 300  
Cleveland, OH 44115  
Telephone: (216) 373-0539  
bflick@dannlaw.com  
*Attorneys for Plaintiff Michaela Christian*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHAELA CHRISTIAN,  
  
Plaintiffs,  
  
vs.  
  
WELLS FARGO BANK, N.A.,  
  
Defendant.

CASE NO. 2:21-cv-01419-EJY

**STIPULATION TO EXTEND TIME TO  
RESPOND AND REPLY TO MOTION  
TO DISMISS  
  
(FIRST REQUEST)**

Plaintiff Michaela Christian and Defendant Wells Fargo Bank, N.A. (collectively referred to as the “Parties”) hereby submit the following Stipulation:

On July 30, 2021, Plaintiff filed her Complaint [ECF No. 1]. On October 27, 2021, Defendant filed a Motion to Dismiss Plaintiff's Complaint [ECF No. 14]. The deadline for Plaintiff to respond to the Motion to Dismiss is November 10, 2021. LR 7-2(b). The deadline for Defendant to reply to in support of the Motion to Dismiss is seven days after service of Plaintiff's response. *Id.* The Parties desire additional time to speak with each other regarding their respective position and to complete their forthcoming briefs given the number of issues set forth in the Motion to Dismiss.

1 WHEREAS, the Parties hereby stipulate and agree to extend the deadline to November 24,  
2 2021 for Plaintiff to either respond to the Motion to Dismiss or file an amended complaint. The Parties  
3 further stipulate and agree to extend the deadline for Defendant to reply in support of the Motion to  
4 Dismiss to December 8, 2021.

5 This is the first stipulation for extension of time to respond to and to reply in support of the  
6 Motion to Dismiss Plaintiff's Complaint. The extension is requested in good faith and is not for  
7 purposes of delay or prejudice to any party.

8  
9  
10 Dated this 5th day of November, 2021.

11 **SNELL & WILMER L.L.P.**

12 By: /s/Kelly H. Dove

13 Kelly H. Dove

14 Nevada Bar No. 10569

15 Holly E. Cheong

16 Nevada Bar No. 11936

3883 Howard Hughes Parkway

Suite 1100

Las Vegas, Nevada 89169

Dated this 5th day of November, 2021.

**FREEDOM LAW FIRM**

/s/George Haines

George Haines, Esq.

Nevada Bar No. 9411

8985 South Eastern Avenue, Suite 350

Las Vegas, Nevada 89123

*Attorneys for Plaintiff*

17 **IT IS SO ORDERED**

18  
19 

20 **UNITED STATES DISTRICT JUDGE**

21  
22  
23  
24  
25  
26  
27  
28  
DATE November 8, 2021